

Docket 9400-YO-100

Commission Staff's Sixth Data Request

Dated October 9, 2014

Response Due Date of October 16, 2014

1. In regards to the company's response to PSCW-01.2 (ERF 219014), the June 1, 2009 Supplemental Indenture for the 8.00% Senior Notes due June 1, 2016, had a similar repurchase requirement for a Reentry Event (Section 3.8).
  - a. Please identify any other Integrys' Energy group system company securities which have a similar requirement.
  - b. Does the sale of IES constitute a "full divestiture of the assets, business and operations of Integrys Energy Services and its Subsidiaries"?
  - c. Has a "full divestiture" already occurred (prior to the proposed sale) since the supplemental indenture became effective.
2. Regarding WEPCO's multi-year credit facilities identified in the company's response to PSCW-01.24, please cite the docket and order date in which the credit facilities were approved by the Commission, or the basis for which the company believes such authorization is not necessary. Please provide copies of the credit facilities.
3. In regards to the company's response to PSCW-01.24 (ERF 219019):
  - a. Does Wisconsin Gas, LLC have a credit facility?
  - b. If yes, please provide a copy.
  - c. If yes and the credit facility is multi-year, please cite the docket and order date in which the credit facilities were approved by the Commission, or the basis for which the company believes such authorization is not necessary.
  - d. If no, please describe Wisconsin Gas LLC's short-term borrowing arrangements.
4. Provide EGEAS analysis with complete up-to-date data sets that assess the claim made on page 12 of the application that "long-term resource planning based on the combined companies' larger generation portfolio and more extensive geographic footprint may reveal opportunities to economize that are not available to stand-alone companies." Please provide the summary and files for EGEAS which consider the following:
  - a. WEPCO system separate with own generation and expansion plan.
  - b. WPSC system separate with own generation and expansion plan.
  - c. A merged WEPCO and WPSC with combined generation and expansion plan.
5. Itemize and quantify any anticipated electric distribution-related operations and maintenance (O&M) and capital cost savings anticipated to result from the merger.

6. How will electric system control centers be incorporated?
7. Will there be a change in the reliability organization for either WEPCO (RFC) or WPS (MRO)? What are the cost and/or benefits?